

**Exhibit 6B**

**July 2, 2014 M. Hall Deposition Transcript**

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| <p style="text-align: right;">Page 1</p> <p>1                   MICHAEL HALL<br/> 2           IN THE UNITED STATES BANKRUPTCY COURT<br/> 3           FOR THE EASTERN DISTRICT OF MICHIGAN<br/> 4<br/> 5<br/> 6   In re                    ) Chapter 9<br/> 7   CITY OF DETROIT, MICHIGAN,    ) Case No. 13-53846<br/> 8                           Debtor.   ) Hon. Steven W. Rhodes<br/> 9<br/> 10<br/> 11<br/> 12<br/> 13       The Videotaped Deposition of MICHAEL HALL,<br/> 14       Taken at 1114 Washington Boulevard,<br/> 15       Detroit, Michigan,<br/> 16       Commencing at 8:57 a.m.,<br/> 17       Wednesday, July 2, 2014,<br/> 18       Before Kathryn L. Janes, CSR-3442, RMR, RPR.<br/> 19<br/> 20<br/> 21<br/> 22<br/> 23<br/> 24<br/> 25</p> | <p style="text-align: right;">Page 3</p> <p>1                   MICHAEL HALL<br/> 2       MICHAEL J. PATTWELL, ESQ.<br/> 3       Clark Hill, PLC<br/> 4       212 East Grand River Avenue<br/> 5       Lansing, Michigan 48906<br/> 6           Appearing on behalf of the Retirement Systems<br/> 7       for the City of Detroit.<br/> 8<br/> 9<br/> 10<br/> 11       STEPHEN C. HACKNEY, ESQ.<br/> 12       Kirkland &amp; Ellis LLP<br/> 13       300 North LaSalle<br/> 14       Chicago, Illinois 60654<br/> 15           Appearing on behalf of Syncora Guarantee Inc.<br/> 16       and Syncora Capital Assurance Inc.<br/> 17<br/> 18<br/> 19<br/> 20<br/> 21<br/> 22<br/> 23<br/> 24<br/> 25</p>   |
| <p style="text-align: right;">Page 2</p> <p>1                   MICHAEL HALL<br/> 2       APPEARANCES:<br/> 3<br/> 4       DEBORAH KOVSKY-APAP, ESQ.,<br/> 5       LESLEY S. WELWARTH, ESQ.<br/> 6       Pepper Hamilton LLP<br/> 7       4000 Town Center<br/> 8       Suite 1800<br/> 9       Southfield, Michigan 48075<br/> 10           Appearing on behalf of the Debtor.<br/> 11<br/> 12<br/> 13<br/> 14<br/> 15<br/> 16       DAN BARNOWSKI, ESQ.<br/> 17       Dentons US LLP<br/> 18       1301 K Street, NW<br/> 19       Suite 600, East Tower<br/> 20       Washington, DC 20005-3364<br/> 21           Appearing on behalf of the Retiree Committee.<br/> 22<br/> 23<br/> 24<br/> 25</p>  | <p style="text-align: right;">Page 4</p> <p>1                   MICHAEL HALL<br/> 2       VINCENT J. MARRIOTT, III, ESQ.<br/> 3       Ballard Spahr LLP<br/> 4       1735 Market Street<br/> 5       51st Floor<br/> 6       Philadelphia, Pennsylvania 19103<br/> 7           Appearing on behalf of Hypothekenbank Frankfurt<br/> 8       AG; Hypothekenbank Frankfurt International S.A.;<br/> 9       and Erste Europäische Pfandbriefund<br/> 10       Kommunalkreditbank Aktiengesellschaft in<br/> 11       Luxemburg S.A.<br/> 12<br/> 13<br/> 14<br/> 15       MARK R. JAMES, ESQ.<br/> 16       Williams, Williams, Rattner &amp; Plunkett, P.C.<br/> 17       380 North Old Woodward Avenue<br/> 18       Suite 300<br/> 19       Birmingham, Michigan 48009<br/> 20           Appearing on behalf of the Financial Guaranty<br/> 21       Insurance Company.<br/> 22<br/> 23<br/> 24<br/> 25</p> |

Pages 1 to 4

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| <p style="text-align: right;">Page 165</p> <p>1 MICHAEL HALL</p> <p>2 had received over 2,500 applicants in connection</p> <p>3 with a recent job posting; isn't that correct?</p> <p>4 <b>A. That's correct.</b></p> <p>5 Q. Do you know how many applications per City</p> <p>6 opening the City has been getting on average</p> <p>7 since you started?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Is it fair to say that the City generally gets a</p> <p>10 sizeable response to any openings it does post?</p> <p>11 <b>A. It depends on the opening and the qualifications</b></p> <p>12 <b>for those people.</b></p> <p>13 Q. I take it, the more specialized positions, you</p> <p>14 don't see the thousands of applications --</p> <p>15 <b>A. That's correct.</b></p> <p>16 Q. -- is that your point?</p> <p>17 <b>A. That's correct.</b></p> <p>18 Q. Have you seen any change in the numbers of</p> <p>19 applications that you've been getting for similar</p> <p>20 types of positions during your tenure here or has</p> <p>21 it been fairly consistent?</p> <p>22 <b>A. During my tenure, it's been fairly consistent.</b></p> <p>23 Q. Where do you -- and as far as you can tell, where</p> <p>24 do new City employees generally come from; are</p> <p>25 they coming from the private sector or are they</p> | <p style="text-align: right;">Page 167</p> <p>1 MICHAEL HALL</p> <p>2 <b>A. Right.</b></p> <p>3 Q. Okay. But not from -- they've not been</p> <p>4 previously employed by other cities?</p> <p>5 <b>A. That's correct.</b></p> <p>6 Q. Okay. With respect to City employees that have</p> <p>7 left the City, do you know generally whether</p> <p>8 they're leaving the City for other municipalities</p> <p>9 or for the private sector?</p> <p>10 MS. KOVSKY-APAP: Objection,</p> <p>11 foundation.</p> <p>12 <b>A. Don't have the data to support an answer.</b></p> <p>13 BY MR. HACKNEY:</p> <p>14 Q. Okay. Don't know one way or the other?</p> <p>15 <b>A. That's correct.</b></p> <p>16 Q. Did Detroit eliminate the residency requirements</p> <p>17 for police and fire employees?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. When did it do that?</p> <p>20 <b>A. I don't recall the date.</b></p> <p>21 Q. Since you've started?</p> <p>22 <b>A. Oh, no.</b></p> <p>23 Q. Before?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Oh, it was something you -- you learned when you</p> |
| <p style="text-align: right;">Page 166</p> <p>1 MICHAEL HALL</p> <p>2 coming from other cities?</p> <p>3 <b>A. Haven't done --</b></p> <p>4 MS. KOVSKY-APAP: Objection. Could you</p> <p>5 just clarify, do you mean where do they live</p> <p>6 geographically?</p> <p>7 BY MR. HACKNEY:</p> <p>8 Q. Sorry, in their prior employer?</p> <p>9 <b>A. Okay. That would depend upon the jobs that these</b></p> <p>10 <b>people are applying for.</b></p> <p>11 Q. Okay. Do you have a sense of that or is it</p> <p>12 something that you've just not studied?</p> <p>13 <b>A. The majority of our jobs that we've hired for this</b></p> <p>14 <b>year have been in my police and fire, EMTs, bus</b></p> <p>15 <b>drivers. Those have been the majority of openings</b></p> <p>16 <b>in seasonal workers, so most of those people are</b></p> <p>17 <b>coming to us not from other municipalities but,</b></p> <p>18 <b>you know, from the public sector.</b></p> <p>19 Q. Oh, from --</p> <p>20 <b>A. Excuse me, from the cities, not employed by the</b></p> <p>21 <b>cities, but just from the communities.</b></p> <p>22 Q. Okay. Let me make sure I understand. They have</p> <p>23 been coming from cities --</p> <p>24 <b>A. From all around.</b></p> <p>25 Q. From all around?</p>                                 | <p style="text-align: right;">Page 168</p> <p>1 MICHAEL HALL</p> <p>2 came to the job?</p> <p>3 <b>A. That's correct.</b></p> <p>4 Q. Do you know if it had happened in 2013 or is this</p> <p>5 something that goes further --</p> <p>6 <b>A. Goes --</b></p> <p>7 Q. -- back?</p> <p>8 <b>A. -- it goes back, further back.</b></p> <p>9 Q. It goes before the EM even?</p> <p>10 <b>A. Before the EM.</b></p> <p>11 Q. Oh, has anyone ever told you why that residency</p> <p>12 requirement was changed?</p> <p>13 <b>A. No.</b></p> <p>14 Q. I just want to talk briefly about union</p> <p>15 negotiations if we could. Do you agree that the</p> <p>16 unions carry substantial influence in the city of</p> <p>17 Detroit?</p> <p>18 MS. KOVSKY-APAP: Objection, form.</p> <p>19 <b>A. Yes.</b></p> <p>20 BY MR. HACKNEY:</p> <p>21 Q. You have personally negotiated with unions during</p> <p>22 your career both here and at GM; isn't that</p> <p>23 correct?</p> <p>24 <b>A. Correct.</b></p> <p>25 Q. And you would agree that they fight hard for</p>                 |

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|---|---|
| <p style="text-align: right;">Page 169</p> <p>1                   MICHAEL HALL</p> <p>2           their members in their negotiations with you,</p> <p>3           correct?</p> <p>4   <b>A. Correct.</b></p> <p>5   Q. And you would agree they do a good job</p> <p>6           representing their membership's interests,</p> <p>7           correct?</p> <p>8   <b>A. They do.</b></p> <p>9   Q. Isn't it true that the unions have been</p> <p>10           withholding their support for the grand bargain</p> <p>11           until they're able to strike a collective</p> <p>12           bargaining agreement with the city?</p> <p>13           MS. KOVSKY-APAP: Objection, foundation</p> <p>14           and form.</p> <p>15   <b>A. Yes.</b></p> <p>16   BY MR. HACKNEY:</p> <p>17   Q. Okay. And so it's basically you can't get the</p> <p>18           unions to come out publicly for the grand bargain</p> <p>19           until you strike the collective bargaining</p> <p>20           agreement with them, correct?</p> <p>21           MS. KOVSKY-APAP: Objection, calls for</p> <p>22           speculation.</p> <p>23           And I would also caution you to the</p> <p>24           extent that this would call for disclosure of</p> <p>25           anything that's been discussed privately in</p>   | <p style="text-align: right;">Page 171</p> <p>1                   MICHAEL HALL</p> <p>2           the communications.</p> <p>3           MS. KOVSKY-APAP: But his state of mind</p> <p>4           is --</p> <p>5           MR. HACKNEY: I don't know what's</p> <p>6           informing his state of mind.</p> <p>7           MS. KOVSKY-APAP: To the extent that</p> <p>8           his state of mind or what he understands about</p> <p>9           what the unions will or will not do is based on</p> <p>10           information that has been conveyed to him through</p> <p>11           the mediation process. Our position is that that</p> <p>12           is covered by the mediation order. That's not a</p> <p>13           state of mind, that's what is his understanding of</p> <p>14           the facts and the facts are conveyed through the</p> <p>15           mediation process.</p> <p>16           MR. HACKNEY: I -- I disagree with you</p> <p>17           because I'm not asking about what created the</p> <p>18           state of mind, I'm asking about the state of mind,</p> <p>19           so it's a difference. It could be that he's</p> <p>20           wrongly assuming that, it could be that it's a</p> <p>21           coincidence that every time the union announces a</p> <p>22           collective bargaining agreement, they then support</p> <p>23           the grand bargain. But are you going to stick</p> <p>24           with this instruction?</p> <p>25           MS. KOVSKY-APAP: To the extent that it</p> |
| <p style="text-align: right;">Page 170</p> <p>1                   MICHAEL HALL</p> <p>2           mediation, it needs to remain confidential, and I</p> <p>3           would direct you not to answer.</p> <p>4   <b>A. I can't answer the question.</b></p> <p>5   BY MR. HACKNEY:</p> <p>6   Q. Okay. Well, don't tell me what people said,</p> <p>7           okay, I want to just ask your understanding.</p> <p>8           Your understanding is that the unions will not</p> <p>9           come out in public support of the grand bargain</p> <p>10           until they have reached a new collective</p> <p>11           bargaining agreement with the City, correct?</p> <p>12           MS. KOVSKY-APAP: Objection to the</p> <p>13           extent that what he understands is based on what</p> <p>14           he learned through the mediation process, it's</p> <p>15           covered by the mediation order.</p> <p>16           I direct you not to answer.</p> <p>17           MR. HACKNEY: Judge Rhodes has said on</p> <p>18           the record that state of mind of participants in</p> <p>19           the mediation is not protected by the mediation</p> <p>20           order. He said it to me at the pretrial</p> <p>21           conference when we were discussing the subject of</p> <p>22           how you could prove up different things about</p> <p>23           different aspects of the case. So he said on the</p> <p>24           record, well, I suppose the City could ask someone</p> <p>25           about their state of mind separate and apart from</p> | <p style="text-align: right;">Page 172</p> <p>1                   MICHAEL HALL</p> <p>2           would require him to disclose and I appreciate</p> <p>3           that --</p> <p>4           MR. HACKNEY: I'm not -- I'm not</p> <p>5           telling him to disclose anything.</p> <p>6           MS. KOVSKY-APAP: -- to the extent that</p> <p>7           the only source of his understanding is what he</p> <p>8           has been told in mediation, I believe that that is</p> <p>9           problematic and I would -- I would ask that he not</p> <p>10           answer.</p> <p>11           MR. HACKNEY: Okay.</p> <p>12   BY MR. HACKNEY:</p> <p>13   Q. So are you going to follow your counsel's</p> <p>14           instruction?</p> <p>15   <b>A. Yes, sir.</b></p> <p>16   Q. Okay. So I take it, you will not tell me</p> <p>17           anything -- anything that you have communicated</p> <p>18           as part of the mediation, correct?</p> <p>19   <b>A. Repeat the question.</b></p> <p>20   Q. You will not tell me any -- any communications</p> <p>21           you've had as part of the mediation, correct?</p> <p>22   <b>A. Correct.</b></p> <p>23   Q. And you will also not tell me any thoughts that</p> <p>24           you've had as a result of the mediation; is that</p> <p>25           correct?</p>   |

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| <p style="text-align: right;">Page 173</p> <p>1 MICHAEL HALL</p> <p>2 <b>A. That's correct.</b></p> <p>3 Q. So to the extent I ask you about judgments that</p> <p>4 you've drawn that -- that result in part from</p> <p>5 communications in the mediation, you will not</p> <p>6 tell them to me, correct?</p> <p>7 <b>A. That's correct.</b></p> <p>8 Q. Okay.</p> <p>9 MS. KOVSKY-APAP: I would just like to</p> <p>10 clarify, if what you are asking from him is his</p> <p>11 judgment that he has drawn that is separate and</p> <p>12 independent of information conveyed to him</p> <p>13 directly in mediation, I think that's a separate</p> <p>14 issue, but we want to be cautious and mindful of</p> <p>15 the Court's instruction that the mediation order</p> <p>16 is an order that is not waivable.</p> <p>17 MR. HACKNEY: Right, because the City</p> <p>18 has been very scrupulous about observing the</p> <p>19 mediation order and it just wants to continue that</p> <p>20 track record of careful adherence to the terms of</p> <p>21 the mediation order.</p> <p>22 MS. KOVSKY-APAP: I don't think</p> <p>23 that requires a response.</p> <p>24 MR. HACKNEY: I guess my question to</p> <p>25 you, Counsel, is to the extent that he has a</p>   | <p style="text-align: right;">Page 175</p> <p>1 MICHAEL HALL</p> <p>2 mediation and what was covered by mediation, then</p> <p>3 I don't really see how he can, if he can't -- if</p> <p>4 he can't separate those.</p> <p>5 BY MR. HACKNEY:</p> <p>6 Q. So let me go back, Mr. Hall, do you know what the</p> <p>7 grand bargain is when I refer to the grand</p> <p>8 bargain?</p> <p>9 <b>A. The grand bargain? Yes.</b></p> <p>10 Q. You know that's the term that's used to describe</p> <p>11 the -- the deal where the art and the Art</p> <p>12 Institute is conveyed to a public trust and there</p> <p>13 are monies that come in that are -- that go into</p> <p>14 the -- the pensions?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Going into your negotiations with the unions,</p> <p>17 prior to communicating with them, was it your</p> <p>18 assumption that the unions would withhold their</p> <p>19 support for the grand bargain until they were</p> <p>20 able to strike a collective bargaining agreement</p> <p>21 with the City?</p> <p>22 <b>A. I had no assumptions.</b></p> <p>23 Q. Okay. So is your understanding with respect to</p> <p>24 whether the unions will support the grand</p> <p>25 bargain, you know, only after they've struck a</p> |
| <p style="text-align: right;">Page 174</p> <p>1 MICHAEL HALL</p> <p>2 judgment that's based in part on things that were</p> <p>3 told to him in the mediation, I take it, you will</p> <p>4 also instruct him not to respond?</p> <p>5 MS. KOVSKY-APAP: If you want to ask</p> <p>6 him his state of mind as to whether he is</p> <p>7 optimistic about a particular outcome or something</p> <p>8 to that effect, a state of mind, but you're asking</p> <p>9 him factual information as to what the unions will</p> <p>10 or will not do, and the only possible source of</p> <p>11 that information would be the mediation process.</p> <p>12 MR. HACKNEY: But I just want to</p> <p>13 clarify so I don't have to waste the witness's</p> <p>14 time. If his state of mind is impacted in part by</p> <p>15 something he was told in the mediation process,</p> <p>16 you will direct him not to answer the question,</p> <p>17 correct?</p> <p>18 MS. KOVSKY-APAP: If he can separate</p> <p>19 his own mental impressions and his own state of</p> <p>20 mind from facts that were conveyed to him and</p> <p>21 information that was conveyed to him in the</p> <p>22 negotiations that took place under the scope of</p> <p>23 the mediation order, then certainly, he can answer</p> <p>24 to that extent. But to the extent that answering</p> <p>25 would effectively reveal what he learned in</p> | <p style="text-align: right;">Page 176</p> <p>1 MICHAEL HALL</p> <p>2 collective bargaining agreement, is that based</p> <p>3 exclusively on things that were told to you by</p> <p>4 the union negotiators?</p> <p>5 <b>A. All those conversations have been in the mediation</b></p> <p>6 <b>process.</b></p> <p>7 Q. I understand that, but I just want to make sure</p> <p>8 your understanding of what the unions will and</p> <p>9 will not do when it comes to recommending the</p> <p>10 grand bargain, that's based exclusively on things</p> <p>11 you've learned in the mediation?</p> <p>12 <b>A. Correct.</b></p> <p>13 Q. You are aware -- isn't it correct that there has</p> <p>14 been no union that has come out publicly in</p> <p>15 support of the grand bargain prior to reaching an</p> <p>16 agreement in principle with the City; isn't that</p> <p>17 correct?</p> <p>18 <b>A. I'm not sure.</b></p> <p>19 Q. Do you agree that the unions' support of the</p> <p>20 grand bargain is important to getting their</p> <p>21 members to vote in favor of the Plan of</p> <p>22 Adjustment --</p> <p>23 MS. KOVSKY-APAP: Objection.</p> <p>24 BY MR. HACKNEY:</p> <p>25 Q. -- based on your experience with these unions?</p>                         |

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